IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

WSOU INVESTMENTS LLC D/B/A	§
BRAZOS LICENSING AND	§ C.A. NO. 6:20-cv-00487-ADA
DEVELOPMENT,	§ C.A. NO. 6:20-cv-00488-ADA
	§ C.A. NO. 6:20-cv-00489-ADA
Plaintiff,	§ C.A. NO. 6:20-cv-00490-ADA
	§ C.A. NO. 6:20-cv-00491-ADA
v.	§ C.A. NO. 6:20-cv-00492-ADA
	§ C.A. NO. 6:20-cv-00493-ADA
ZTE CORPORATION, ZTE (USA) INC.	§ C.A. NO. 6:20-cv-00494-ADA
AND ZTE (TX), INC.,	§ C.A. NO. 6:20-cv-00495-ADA
	§ C.A. NO. 6:20-cv-00496-ADA
Defendants.	§ C.A. NO. 6:20-cv-00497-ADA
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<u>DEFENDANTS' NOTICE OF COMPLIANCE REGARDING EXCHANGE OF SECOND NARROWED CLAIM TERMS FOR CONSTRUCTION</u>

TO THE HONORABLE COURT:

Pursuant to the Court's First Amended Scheduling Order, Dkt. 45,¹ and the Court's February 26, 2021 e-mail order,² Defendants hereby notify the Court that Defendants served their second narrowed claim terms for claim construction on Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development via electronic mail on March 1, 2021.

Defendants reserve the remaining identified terms and maintain that they are indefinite, lack support, and/or are invalid under 35 U.S.C. §§ 112(a), (b), and (f).

¹ There are 11 pending cases. Citations throughout refer to new WDTX Case Nos. -00487 through -00497, and specific citations reference to the docket for WDTX Case No. -00487.

² The e-mail order via e-mail exchanges between the parties and the Court are attached as Ex. 1, and the parties' associated charts referenced in the e-mail exchanges are attached as Ex. 2.

DATED: March 2, 2021 Respectfully submitted,

/s/Lionel M. Lavenue

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Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on March 2, 2021.

/s/Lionel M. Lavenue

Lionel M. Lavenue